

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

A.J. and Q.C.,

Plaintiffs,

v.

MASP, LLC,

Defendant.

CIVIL ACTION FILE NO.

1:23-CV-04247-JPB

DEFENDANT MASP, LLC’S MOTION FOR SUMMARY JUDGMENT

COMES NOW, MASP, LLC, (“Defendant”), and hereby files this Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56 and Local Rule 56.1, and relies on the following in support thereof:

1. Brief in Support of Defendant’s Motion for Summary Judgment, with exhibits;
2. Statement of Undisputed Material Facts and Theories of Liability;
3. Deposition of Q.C. taken on May 23, 2024;
4. Deposition of A.J. taken on May 24, 2024;
5. Deposition of Alpesh Patel as the Corporate Representative for the 30(b)(6) Deposition of MASP, LLC, taken on July 29, 2024;

6. Portions of Redacted Police Summary of Interview with A.J. conducted on March 22, 2013;
7. Excerpts from MASP, LLC's Interrogatory Responses;
8. Excerpts from A.J.'s Interrogatory Responses;
9. All other pleadings and evidence properly in the record.

Respectfully submitted, this 11th day of October, 2024.

SWIFT, CURRIE, McGHEE & HIERS

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CERTIFICATE OF COMPLIANCE

Counsel hereby certifies that this document has been prepared with one of the font and point selections approved by the Court pursuant to L.R. 5.1(C) of the Northern District of Georgia, specifically, 14 point, Times New Roman font.

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CERTIFICATE OF SERVICE

This are to certify that on the 11th day of October, 2024, I have caused to be served upon counsel for all parties a true and correct copy of the foregoing **DEFENDANT'S MOTION FOR SUMMARY JUDGMENT** by filing same through use of the Court's online filing system, the CM/ECF system for the United States District Court for the Northern District of Georgia, which will serve all counsel of record.

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4895-1145-0094, v. 3